

1 *[Submitting Counsel on Signature Page]*

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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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11 IN RE: SOCIAL MEDIA ADOLESCENT  
12 ADDICTION/PERSONAL INJURY  
13 PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

14 This Document Relates to:

15 ALL ACTIONS

**STIPULATION AND [PROPOSED]  
ORDER GOVERNING PLAINTIFFS'  
RESPONSES TO DEFENDANTS' FIRST  
SET OF REQUESTS FOR  
PRODUCTION NOS. 32, 33, 34, AND 66**

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18 On August 8, 2024, the Court heard argument on the Parties' Joint Letter Brief Regarding  
19 Plaintiffs' Responses to Defendants' Requests for Production (ECF No. 1051). The Court hereby  
20 ORDERS as follows:

21 Plaintiffs shall produce documents responsive to the following requests, limited to the  
22 Relevant Time Period, as defined in Defendants' First Set of Requests for Production:

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24 32. All DOCUMENTS RELATING TO any criminal investigation or proceeding  
25 involving YOU or YOUR biological parent, step-parent, legal guardian, or anyone with  
26 whom YOU resided, either part-time or full-time, during the Relevant Time Period, as a  
27 suspect, defendant, respondent, victim, complainant, and/or witness, INCLUDING police  
28 records, sworn statements, juvenile justice records, criminal justice records, arrest records,  
court proceedings, transcripts, conviction records, sentencing records, bail records, and  
supervision records.

33. All DOCUMENTS RELATING TO any civil family court, juvenile court, neglect, truancy, divorce, or foreclosure proceeding or investigation involving YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the RELEVANT TIME PERIOD, INCLUDING any prior sworn testimony by YOU.

34. All DOCUMENTS RELATING TO any interaction with child protective services, child and family services, foster care, adoption, or any other similar child welfare agency or organization RELATING TO YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the Relevant Time Period.

66. All DOCUMENTS RELATING TO any break ups that (1) YOU have experienced with a boyfriend, girlfriend, significant other, or other romantic partner, with whom you were in a relationship of six months or longer, or (2) YOU discussed with a medical or mental health provider.

In response to these Requests for Production, Plaintiffs shall produce Known Responsive Documents pursuant to Paragraph 7 of the Order Governing Production of Electronically Stored Information and Hard Copy Documents and shall run search terms, to be agreed by the Parties, across the custodial sources from which documents are being produced for the remaining Requests, including Routine Devices as defined in Discovery Management Order 8.

By Wednesday, August 14, 2024, Plaintiffs shall inform Defendants which bellwether Plaintiffs were involved in breakups resulting from relationships that meet the criteria of revised Request No. 66 set out above, so that case-specific search terms can be crafted.

Dated: August 12, 2024

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**ATTESTATION**

I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 12, 2024

/s/ Gregory L. Halperin

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